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10	BEFORE THE
11	CALIFORNIA BOARD OF OCCUPATIONAL THERAPY DEPARTMENT OF CONSUMER AFFAIRS
12	STATE OF CALIFORNIA
13	In the Matter of the Petition to Revoke Probation Case No. OT2008-13-S
14	Against:
15	TERRI ANN SCHONBROD 15551 Tracy Street, Apt. C AMENDED PETITION TO REVOKE
16	San Lorenzo, California 95630 PROBATION
17	Occupational Therapist License No. OT 6305
18	Respondent.
19	
20	Complainant alleges:
21	PARTIES
22	1. Heather Martin (Complainant) brings this Amended Petition to Revoke Probation
23	solely in her official capacity as the Executive Officer of the Board of Occupational Therapy,
24	Department of Consumer Affairs.
25	2. On or about February 14, 2003, the California Board of Occupation Therapy issued
26	Occupational Therapist License Number OT 6305 to Terri Ann Schonbrod (Respondent). The
27	Occupational Therapist License was in effect at all times relevant to the charges brought herein
28	and will expire on March 31, 2012, unless renewed.

3. In a disciplinary action entitled In the Matter of the Accusation Against Terri Ann Schonbrod, Case No. OT2008-13, the Board of Occupational Therapy issued a decision, effective December 29, 2009, in which Respondent's Occupational Therapist License No. OT6305 was revoked. However, the revocation was stayed and Respondent's license was placed on probation for a period of three (3) years with certain terms and conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

JURISDICTION

- 4. This Amended Petition to Revoke Probation is brought before the California Board of Occupational Therapy ("Board"), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code ("Code") unless otherwise indicated.
 - 5. Section 2570.26, subdivision (a) of the Codes states:

"The board may, after a hearing, deny, suspend, revoke, or place on probation a license, certificate, inactive license, inactive certificate, or limited permit."

6. Section 2570.30 of the Code states:

"The board shall retain jurisdiction to proceed with any investigation, action or disciplinary proceeding against a license, or to render a decision suspending or revoking a license, regardless of the expiration, lapse, or suspension of the license by operation of law, by order or decision of the board or a court of law, or by the voluntary surrender of a license by the licensee."

FIRST CAUSE TO REVOKE PROBATION

7. At all times after the effective date of Respondent's probation, Condition 14 stated that Respondent shall abstain from the use of alcohol. Grounds exist for revoking the probation and for imposing the revocation penalty that was stayed because Respondent tested positive for the presence of alcohol in random tests conducted on January 29, 2010, February 4, 2010, and July 6, 2010.

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SECOND CAUSE TO REVOKE PROBATION

- 8. At all times after the effective date of Respondent's probation, Condition 15 stated that Respondent shall submit to biological fluid samples upon request by the Board or its designee. Grounds exist for revoking the probation and for imposing the revocation penalty that was stayed, as follows:
- A. Respondent failed to appear for scheduled testing on May 24, 2010, June 14, 2010, June 21, 2010, and July 1, 2010.
- B. Respondent failed to call or log-in daily, pursuant to required procedures, to determine if she had been scheduled for testing on April 25 and 30, 2010; May 5, 14, 15, 23, 24, 30, and 31, 2010; June 4, 10, 18, 19, 21, 23, 26, and 29, 2010.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged here, and that following the hearing, the California Board of Occupational Therapy issue a decision:

- 1. Revoking or suspending Occupational Therapy License Number OT 6305, issued to Terri Ann Schonbrod.
- 2. Vacating the stay and reimposing the order of revocation on Occupational Therapy License Number OT 6305, issued to Terri Ann Schonbrod.
 - 3. Taking such other and further action as deemed necessary and proper.

DATED 29 July 2010

HEATHER MARTIN

Executive Officer

California Board of Occupational Therapy

Department of Consumer Affairs

State of California
Complainant

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